

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 13cr30021-DPW
)	
ANGEL LUIS MEDINA,)	
DOEL VEGA, and)	
LUZ ENEIDA MORALES,)	
Defendants.)	

PARTIES' JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(A)

The United States of America, by Carmen M. Ortiz, United States Attorney for the District of Massachusetts, and counsel for Angel Luis Medina, Oscar Cruz, Jr., Esq., and Luz Eneida Morales, Raymond A. O'Hara, Esq., hereby file their joint memorandum pursuant to Local Rule 116.5(A):

1. The government has provided the defendants with substantial discovery relating to a wiretap conducted in the District of Florida, the recordings related to that wiretap and summaries of pertinent calls. The government also has provided the defendants with discovery related to several search warrants executed in Massachusetts and the arrest of two of the defendants. However, the government needs an additional two weeks from the date of the status conference to complete automatic discovery. Since automatic discovery is not complete, there are no pending discovery requests.

2. As noted above, the government requests that it be given two weeks from the date of the status conference to complete automatic discovery.

3. The parties request that the Court allow the defendants two weeks from the completion of automatic discovery to submit additional discovery requests.

4. At this time protective orders addressing the disclosure or dissemination of sensitive information concerning victims, witnesses, defendants, or law enforcement sources or techniques are not necessary.

5. The parties agree that the scheduling of Fed. R. Crim. P. 12(b) motions at this time is premature.

6. The government will provide the defendants with expert reports relating to the examination of suspected controlled substances and other items.

7. The parties agree that all of the time from the defendants' arraignments on May 20, 2013 (Morales), and June 25, 2013 (Medina and Vega), to the date of the next status conference should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7). The parties agree that the ends of justice served by excluding this time from the Speedy Trial Act outweigh the best interests of the public and defendants in a speedy trial. The parties agree that this Speedy Trial Act exclusion is appropriate in order to allow the parties to complete automatic discovery and attempt to resolve additional discovery requests.

8. The parties recommend that an additional status conference be scheduled in forty-five days.

Respectfully submitted,

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

By: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Oscar Cruz, Jr., Esq.
Oscar Cruz, Jr., Esq.
Attorney for Angel Luis Medina

Raymond A. O'Hara, Esq.
Raymond A. O'Hara, Esq.
Attorney for Luz Eneida Morales

CERTIFICATE OF SERVICE

July 25, 2013

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Kevin O'Regan

Kevin O'Regan

Assistant U.S. Attorney